

## **REMARKS/ARGUMENTS**

### **1.) Claim Amendments**

The Applicant has amended claims 22, 28, and 31; claims 24 and 33 have been canceled. Applicant respectfully submits no new matter has been added. Accordingly, claims 22, 23, 25-32, and 34-36 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### **2.) Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 22, 23, 25, 26, 28, 30-32, 34 and 35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Trask (US 5,945,919) in view of Batra, *et al.* (US 2003/0172125). The Applicant respectfully traverses the Examiner's rejections and submits the following remarks for the Examiner's favorable reconsideration. The Applicant has further amended independent claims 22, 28, and 31 to more clearly and distinctly claim the subject matter which the Applicant considers as his invention.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. **Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations (MPEP 2143).** In that regard, the Applicant respectfully submits that the Examiner's two references still fail to teach or suggest each and every element of the presently pending independent claims.

Claim 22, as amended, recites:

22. A method for enabling one or more of a plurality of location service clients (LSCs) to contact a user of a mobile device, wherein the method comprises the steps of:

selection of at least one authorized LSC type on the mobile device, said at least one authorized LSC type selected from type identifiers associated with said plurality of LSCs;

transmission of one or more type identifiers from the mobile device to a server in a telecommunication system, the one or more type identifiers identifying the selected at least one authorized LSC type;  
analysis of the type identifier by said server to determine one or more LSCs associated with the selected type;  
determination of at least one address of the one or more LSCs associated with the selected type;  
sending information from said server to the at least one address of the one or more LSCs associated with the selected type, said information enabling said one or more LSCs to contact said mobile device;  
determining that a threshold number has been reached, the threshold number indicating a limit for a number of said LSCs; and,  
limiting to the threshold number the number of the one or more LSCs to which said information is sent. (emphasis added)

The Applicants' invention is directed to a system in which a user of a mobile device can select from a plurality of location-based services ("location service clients"). The mobile device transmits one or more type identifiers to a server; the type identifiers identify selected ones of the location service clients that are to be authorized to contact the mobile device. The server analyzes the received type identifiers to determine the authorized location service clients and sends information to an address for each such client. The information allows an authorized location service client to contact the mobile device.

The Examiner stated that Trask discloses all the subject matter except for at least one authorized LSC type selected from type identifiers associated with a plurality of LSCs. The Applicant agrees that Trask is missing this element. As previously discussed, Trask relates to dispatching a vehicular service to a user of a mobile terminal. Trask does not disclose the use of a "type identifier". The system disclosed by Trask does not need a type identifier because the dispatcher free vehicle allocation (DFVA) system is only used for a single type of service; e.g., a taxi service. Thus, there is no need in the Trask system for multiple type identifiers to differentiate between different authorized services.

Batra discloses a common location-based service adapter interface. The interface includes a uniform input interface through which location-based services can be requested using a uniform format which is independent of any specific formatting

required by a particular service adapter configured to process the location-based services.

However, as stated above, Trask does not need a type identifier because the dispatcher free vehicle allocation (DFVA) system is only used for a single type of service. Since there is no need for multiple type identifiers to differentiate between different authorized services in Trask, there is no motivation to combine the elements of Trask with using a plurality of location-based services as disclosed in Batra. Because of the lack of motivation to combine both references, the combination of Trask and Batra is improper.

Furthermore, the Applicant has amended claim 22 to incorporate the limitations of claim 24 into claim 22. On page 4 of the Office Action, the Examiner stated claim 24 is unpatentable over Trask in view of Batra and Ur as stated in the Office Action dated October 3, 2006. The Applicant respectfully disagrees. Ur discloses assigning priorities according to various parameters to find suitable providers. Ur does not teach or suggest determining that a threshold number of LSCs has been reached. In particular, there is no mention whatsoever of any limitation or threshold of providers in Ur. Ur merely discloses assigning priorities to a plurality of providers.

Thus, the combination of Trask, Batra and Ur does not teach or suggest all the elements recited in amended claim 22. In addition, independent amended claims 28 and 31 contain analogous limitations to claim 22 and also are not taught or suggest by Trask, Batra and Ur. Claims 23, 25, and 26 depend from amended claim 22 and recite further limitations in combination with the novel elements of claim 22. Claim 30 depends from amended claim 28 and recites further limitations in combination with the novel elements of claim 28. Claims 32, 34 and 35 depend from amended claim 31 and recite further limitations in combination with the novel elements of claim 31. Therefore, the allowance of claims 22, 23, 25, 26, 28, 30-32, 34 and 35 is respectfully requested.

Claims 24 and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Trask (US 5,945,919) in view of Batra, *et al.* (US 2003/0172125) and in view of Ur (US 6,615,046). As discussed above, the limitations of claim 24 have been

incorporated into claim 22. In addition, the limitations of claim 33 have been incorporated into claim 31. Claims 24 and 33 have been canceled.

Claims 27, 29 and 36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Trask (US 5,945,919) in view of Batra, *et al.* (US 2003/0172125) and in view of Calvert (US 6,526,275). The Applicant respectfully traverses the Examiner's rejections and submits the following remarks for the Examiner's favorable reconsideration. The Applicant has further amended independent claims 22, 28, and 31 to more clearly and distinctly claim the subject matter which the Applicant considers as his invention.

As discussed above, claims 22, 28 and 31 have been amended to incorporate the limitations of claim 24 and now recite determining that a threshold number has been reached and limiting the threshold number to the number of the one or more LSCs to which the information is sent. On page 4 of the Office Action, the Examiner stated claim 24 was unpatentable over Trask in view of Batra and Ur as stated in the Office Action dated October 3, 2006. The Applicant respectfully disagrees. Ur discloses assigning priorities according to various parameters to find suitable providers. Ur does not teach or suggest determining that a threshold number of LSCs has been reached. In particular, there is no mention whatsoever of any limitation or threshold of providers in Ur. Ur merely discloses assigning priorities to a plurality of providers.

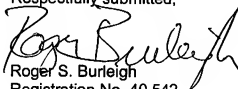
Thus, the combination of Trask, Batra and Ur does not teach or suggest all the elements recited in amended claims 22, 28, or 31. Claim 27 depends from amended claim 22 and recites further limitations in combination with the novel elements of claim 22. Claim 29 depends from amended claim 28 and recites further limitations in combination with the novel elements of claim 28. Claim 36 depends from amended claim 31 and recites further limitations in combination with the novel elements of claim 31. Therefore, the allowance of claims 27, 29 and 36 is respectfully requested.

**CONCLUSION**

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

  
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